

**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MARYLAND  
SOUTHERN DIVISION**

DINESH VERMA

Plaintiff

v.

Civil Case No.:

LOWE'S COMPANIES, INC.

Defendant

**NOTICE OF REMOVAL**

The Defendant, Lowe's Companies, Inc., body corporate of the State of North Carolina, by their attorneys Bacon, Thornton, & Palmer LLP and Patricia M. Thornton, pursuant to 28 USC § 1441 and 1446 file this Notice of Removal of this action from the Circuit Court for Prince George's County, Maryland in which it is now pending to the United States District Court for the District of Maryland and rely upon the following facts to support removal of this case:

1. Plaintiff filed suit in the Circuit Court for Prince George's County, Maryland, docketed as Civil Case No. CAL14-22521.
2. Defendant is named as the only Defendant in the above-referenced action pending in the Circuit Court for Prince George's County, Maryland.
3. The Complaint filed in this action was served on the Defendant, Lowes Companies, Inc. on or about October 20, 2014. The above-captioned Notice of Removal has been filed in this Court within thirty (30) days from service of the Complaint on the Defendant.
4. Attached hereto and filed herewith, as **Exhibit 1**, are copies of the Writ of Summons, Complaint, and Jury Demand that have been filed in the state court action. Upon information

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and belief, no other filings have been made in the Circuit Court for Prince George's County, Maryland. The above-captioned petition for removal has been filed in this Court within thirty (30) days from the service of the Complaint upon the petitioner.

5. The amount the Plaintiff has alleged to be in controversy in this action, exclusive of interests and costs, exceeds the sum of \$75,000.00.

6. At the time of the commencement of the time of this action and at all relevant times, the Plaintiff and Defendant in this action are citizens of different states. As evidence by the Affidavit attached hereto as **Exhibit 2**, Lowe's Companies, Inc. is a North Carolina corporation with its principal place of business in North Carolina. The Plaintiff is a citizen and domicile of the County of Prince George's County, in the State of Maryland. Therefore, complete diversity is present in this action.

7. This action is one over which this Court has original jurisdiction under the provisions of 28 USC § 1332 and is one that the Defendant may remove pursuant to 28 USC § 1441.

8. Venue lies in this Court because Plaintiff's action is pending in this district and division.

9. That after properly filing this petition, Defendant will give written notice thereof to the Plaintiff and file a copy of this Notice of Removal with the Clerk of the Circuit Court for Prince George's County, Maryland to be docketed in Civil Case Number CA14-22521.

WHEREFORE, Defendant Lowe's Companies, Inc. notes this removal of this action from the Circuit Court for Prince George's County, Maryland to the United States District Court for the District of Maryland.

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Respectfully submitted,



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(Attorney for Defendant Lowe's Companies, Inc.)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 19<sup>th</sup> day of November, 2014, that a copy of the foregoing was mailed, postage prepaid, first class to:

Anthony M. Shore, Esquire  
7415 Oak Lane  
Chevy Chase, MD 20815  
301-661-5222  
(Attorney for Plaintiff)



Patricia M. Thornton

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